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AZ CORP COMMISSION
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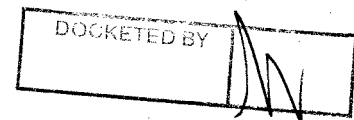
Via Overnight Mail

7 January 2000

Jack Rose
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007-2996

Arizona Corporation Commission
DOCKETED

JAN 10 2000



RE: US West Communications, Inc.'s Compliance with Section 271 of the
Telecommunications Act of 1996, Docket No. U-0000-97-238, T00000A-
97-0238

Dear Mr. Rose:

Enclosed is an original and ten (10) copies of the *Comments of the Telecommunications
Resellers Association*, to be filed in the above referenced docket.

Questions may be directed to me.

Sincerely,
TELECOMMUNICATIONS RESELLERS ASSOCIATION

Andrew O. Isar

Enclosures

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF U S WEST)	
COMMUNICATIONS, INC.'S)	
COMPLIANCE WITH SECTION 271)	Docket No. T-00000A-97-0238
OF THE TELECOMMUNICATIONS)	
ACT OF 1996)	
_____)	

COMMENTS OF
THE TELECOMMUNICATIONS RESELLERS ASSOCIATION

The Telecommunications Resellers Association ("TRA")¹, on behalf of its members, and pursuant to the Arizona Corporation Commission's ("Commission") December 30, 1999 *Notice* in the above-captioned proceeding, briefly addresses the OSS testing procedures undertaken in other states for consideration by the Commission as it prepares to institute a comprehensive test of U S West Communications, Inc.'s ("U S West") operations support system ("OSS") capabilities.

As has become readily apparent through the regional Bell operating company ("RBOC") OSS testing conducted in California, New York, Pennsylvania, Texas, and now beginning in Florida, Massachusetts and elsewhere, comprehensive RBOC OSS testing is crucial for the development of a complete and accurate record of RBOC compliance with the Section 271 "competitive checklist" for in-region, interLATA market entry pursuant to the Telecommunications Act of 1996 (the "Act"). Only through such comprehensive OSS testing as envisioned by the Commission and

¹ Founded in 1992, the Telecommunications Resellers Association is the Washington, D.C.-based national organization for resellers of telecommunications Services. TRA represents more than 800 companies involved in the provision of domestic and international long distance, local, wireless, and other enhanced telecommunications services. TRA was created and carries a continuing mandate to foster and promote telecommunications competition, to support the telecommunications industry, and to protect the interests of entities engaged in the resale of telecommunications services.

conducted in other states, can U S West's delivery of a fully functional, non-discriminatory OSS be accurately evaluated.

From the experience gained by TRA in OSS testing, and through TRA member involvement in the Bell Atlantic – New York OSS tests in particular, TRA offers these brief observations regarding the strengths of other state RBOC OSS testing that should be incorporated into the Commission's approach to U S West OSS testing.

I. OSS TESTING MUST BE ALL INCLUSIVE.

The Commission recognizes that there will be a variety of Competitive Local Exchange Carrier ("CLEC") entry strategies and operational environments present which should be reflected in OSS testing "mix" of services, orders, transactions and interface methods tested, both automated and manual. Active CLEC involvement throughout the testing process, from test design through its conduct, ensures that the variety of entry strategies and operating environments are fully reflected in OSS test results and that U S West's test results are indeed accurate for purposes of determining its true compliance with the Act. This has been the approach taken in the California, New York, Texas, and now in Florida OSS tests.

A. CLECs Should be Actively Involved in OSS Testing.

The need for CLEC involvement in the testing process cannot be overemphasized. OSS testing should not be designed exclusively by the entity being tested nor be tested solely by a pseudo local exchange carrier. Actual testing should involve those entities who rely upon U S West's OSS and procedures and who are most familiar with the problems and concerns which arise through their daily interaction with the incumbent. Any OSS testing conducted through a pseudo CLEC alone will result in

an incomplete, slanted picture, which is not fully representative of the RBOC's true performance.

At least two primary reasons for the inability of a pseudo CLEC to provide a fully accurate assessment of U S West's OSS should be readily apparent. First, a pseudo CLEC cannot test, let alone be aware of, every conceivable type of transaction between the incumbent and CLECs. CLECs are familiar with the myriad of transactions and that arise through their daily interaction with U S West. For example, some CLECs may use less common procedures to process "complex" orders, where a subscriber's service entails one or more less frequently used features such as foreign exchange service, or use of specialized ancillary features such as Caller ID, among others. CLEC first-hand knowledge of how the U S West's OSS and procedures function for the type of services the CLECs offer will can assist the testing entity in designing and evaluating a variety of transactions which might not otherwise be included in the scope of testing parameters.

Second, CLEC involvement reduces the potential for incumbent discrimination in favor of the pseudo CLEC, whose identity is well known to the incumbent. The incumbent has an inherent incentive to provide the necessary resources and support in response to the pseudo CLEC's requests during the testing period to promote more favorable results. Given the incumbent's orientation to a pseudo CLEC, the pseudo CLEC alone cannot obtain an honest appraisal of the incumbent's approach to competitors.

Active CLEC involvement in OSS testing makes it more difficult for the incumbent to "game" the test process. In independent third party testing of Bell Atlantic

- New York's OSS, for example, involvement of CLECs including some TRA members, revealed additional issues that would have otherwise not been uncovered through pseudo CLEC testing. It became evident to the testers overseeing CLEC interaction with the incumbent that the incumbent's account management team often responded to CLECs with indifference and inconsistency. The incumbent's representatives were frequently unresponsive, marginally helpful, and their responses inconsistent. The attitudes displayed by the incumbent's representatives characterize the type of nuances which would not be readily discernable through pseudo CLEC testing, but which are every bit as important in painting a complete picture of the incumbent's compliance. The testing entity can more readily evaluate incumbent performance on "live" orders under less controlled circumstances.

In its September report to the Texas Public Utility Commission, Telecordia Technologies, the organization conducting third party testing of Southwestern Bell's OSS, summarized the collaborative industry approach taken in Texas.

The OSS Readiness evaluation in Texas (Project No. 2000) was devised as a "collaborative industry approach" where all CLECs that were registered for business in Texas were given the opportunity to participate in the TAG [technical assistance group]. TAG members were asked to participate in carrier-to-carrier testing efforts and to provide the industry perspective. Several large and small CLECs participated in the testing ... The purpose of the TAG was to provide an industry-wide body of technical expertise to the [Texas Public Utility Commission] to design and execute tests that were appropriate, accurately, and fairly represented the requirements and interests of SWBT and the CLECs within the context of Section 271 of [the Act].²

² *Investigation of Southwestern Bell telephone Company's Entry Into the Texas Inter Local Area Transport Area (interLATA) Telecommunications Market*, Texas Public Utility Commission, Project No. 20000, Southwestern Bell OSS Readiness Report, Telecordia Technologies (September 1999), at 13.

Regarding CLEC participation in the actual test process, Florida's recently adopted BellSouth Telecommunications, Inc. OSS Master Test Plan stresses

CLECs operating in Florida will be asked to volunteer to participate in certain portions of this test. The inclusion of selected CLEC live transactions provides an alternative test method for transactions which may not be practical to provide through the test ... and further facilitates a more realistic depiction of real world production. CLEC participation will also be solicited to provide real test cases during the test period ... Use of CLEC live transactions allows for an element of blind testing and tracking performance in a "real-world" environment. It also provides a means to help control for "test bias."³

A collaborative industry approach, such as that begun by the Commission, will prove effective throughout the conduct of U S West OSS testing in Arizona. CLEC involvement in the test phase will be equally effective in determining U S West's true capabilities.

B. OSS Testing Should Reflect All Current U S West Systems and Processes.

OSS testing should be fully representative of all systems and procedures currently used by U S West to serve CLEC customers. Testing should include manual as well as automated systems. Because virtually all of TRA's smaller CLEC members currently rely on manual order processing and interfaces when providing service utilizing U S West's network services, testing of U S West's manual processes is as important to thorough OSS testing as is testing of automated systems and procedures. U S West's ability to manually process CLEC orders at "commercially reasonable" volumes is every

³ BellSouth Telecommunications, Inc., OSS Evaluation Project Master Test Plan, KPMG Peat Marwick, *In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory*, Florida Public Service Commission Docket No. 981834-TP, (December 2, 1999) ["Florida Master Test Plan"] at 16.

bit as important in determining U S West's true functional capabilities and compliance with the Act as is the testing of automated processes.

Testing of manual processes was conducted by KPMG Peat Marwick ("KPMG") in its Bell Atlantic – New York OSS testing and by Telecorida in the Texas Southwestern Bell telephone Company OSS tests. Manual process capabilities are now to be tested by KPMG in its evaluation of BellSouth Telecommunications, Inc.'s Florida OSS. According to KPMG's Final New York Report

The Manual Order Process Evaluation Test is designed to evaluate the manual order handling processes of Bell Atlantic New York's (BA-NY) Telecom Industry Services Ordering Centers (TISOCs) located in Manhattan and Boston and at a contract outsourcing facility in Langhorne, PA. The test uses interviews, a structured walk through, and documentation review to determine whether BA-NY's manual processes provide a framework for efficient receipt, review, and execution of manual orders. This test is a procedural evaluation of BA-NY's established processes for handling manual orders. BA-NY's performance of manual order operations is tested from a performance perspective in POP Tests 1, 2, and 5.⁴

Regarding the manual test process in Florida, KPMG notes

The POP Manual Order Processing Evaluation is a comprehensive review of the methods and procedures used to handle orders that have been manually submitted or require manual intervention by [BellSouth Telecommunications, Inc.] during order processing. Operational analysis techniques will be used to conduct this test. It will rely on the development of various checklists to facilitate a structured walk through of the order handling process. Additionally, practices related to the manual processing of orders will be compared with retail practices for parity, to the extent that specific retail analogs are identified.⁵

⁴ *Bell Atlantic OSS Evaluation Project Final Report Version 2.0*, KPMG Peat Marwick, *Petition of New York Telephone Company for Approval of its Statement of Generally Available Terms and Conditions Pursuant to Section 252 of the Telecommunications Act of 1996 and Draft Filing of Petition for InterLATA Entry Pursuant to Section 271 of the Telecommunications Act of 1996*, New York Public Service Commission Docket No. 97-C-0271 (August 6, 1999).

⁵ Florida Master Test Plan at 47.

To be entirely representative of U S West true capabilities, OSS testing should include all processes *currently* used by U S West to support CLEC customers, including manual processes, consistent with the testing methodology adopted in the New York and Texas tests and to be performed in Florida.

II. EFFECTIVE INFORMATION DISSEMINATION WILL PROMOTE ACTIVE CLEC INVOLVEMENT AND A MORE EFFECTIVE TEST PROCESS.

Staff has expressed an interest in learning how other state commission use their web sites to disseminate OSS test-related information. Clearly, the Internet is a valuable tool for dissemination of OSS test related information, as is evident most recently by the U S West Regional Oversight Committee and the Florida Public Service Commission's use of the Internet to distribute test-related information to interested parties. Florida's approach is particularly instructive, and serves as an excellent model for dissemination of OSS test related information which should be considered by the Commission.

The Florida Public Service Commission's Telecommunications Division Internet web site includes a specific page devoted exclusively to the Commission's OSS test process.⁶ This page contains links to related Commission orders, the final OSS master test plan, interested party comments on the master test plan submitted prior to its adoption, an OSS test implementation schedule, related public notices, schedule for collaborative sessions, and minutes from past collaborative sessions.⁷ Web site posting of all OSS test related documents enables anyone with Internet access to become fully informed about the OSS test process at anytime. And ready access to workshop minutes

⁶ <http://www.psc.state.fl.us/industry/telecomm/index.html>

⁷ <http://www.psc.state.fl.us/industry/telecomm/oss/oss.html>

and schedules allows smaller CLECs, who do not have the resources participate in all OSS workshops, to remain abreast of current developments and determine when participation may be most appropriate.

If the Commission's OSS testing process is to be fully collaborative and inclusive of the CLECs, OSS testing information should be broadly disseminated to the industry and public. The Commission's web site serves as a perfect tool for this purpose and should be designed to provide all applicable information as the Florida Commission's web site now offers.

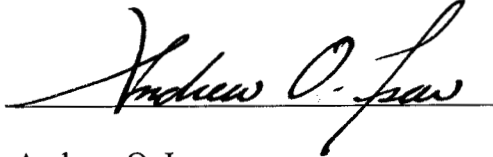
II. CONCLUSION

TRA appreciates Staff's interest in evaluating the OSS testing approach taken in other states. TRA believes that the New York and Texas approaches to OSS testing, in particular, have set the bar for comprehensive, all inclusive testing of RBOC OSS and procedural capabilities. These states' OSS tests have included full industry participation and tested all aspects of the incumbent's ability to support CLEC customers, consistent with the incumbents' statutory obligations under the Act. A similar approach taken by the Commission and supported through wide dissemination of OSS test-related information as is being done by the Florida Commission through its web site, will contribute to the ultimate success of the Commission's efforts to accurately test U S West's capabilities and, moreover, U S West's compliance with the competitive checklist for in region interLATA market entry.

Signature on following page.

Respectfully submitted this 7th day of January, 2000,

Telecommunications Resellers Association

By: 

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Florida Public Service Commission

Operation Support Systems Testing

● Order Initiating Phase 1 OSS testing in Florida

- Proposal (PDF file size= 334K)
- Appendix A
- Appendix B

● Final Florida Master Test Plan

- Download MS Word Version (File Size = 623KB) or
- Download Adobe PDF Version (File Size = 764KB)

● Interim Performance Measure Schedule

● Interim Performance Measures Initial Comments

- AT&T (PDF file size = 15 KB)
 - Attachment A (PDF file size = 39KB)
 - Attachment B (PDF file size = 37KB)
 - Attachment C (PDF file size = 6 KB)
 - Attachment D (PDF file size = 76 KB)
- MCI / ITC^DeltaCom (PDF file size = 22 KB)
 - Attachment A (PDF file size = 248 KB)
 - Attachment B (PDF file size = 41 KB)
 - Attachment C (PDF file size = 35 KB)
 - Attachment D (PDF file size = 34 KB)
- Rhythms (PDF file size = 26 KB)
- MGC (PDF file size = 35 KB)
- Time Warner (PDF file size = 270 KB)
- Sprint (PDF file size = 16 KB)

● Interim Performance Measures Second Comments

- AT&T (PDF file size = 445 KB)
 - Attachment A (PDF file size = 432 KB)
- MCI / ITC^DeltaCom (PDF file size = 402 KB)
- Rhythms (PDF file size = 29 KB)
- BellSouth (PDF file size = 17 KB)
- Time Warner (PDF file size = 25 KB)

● Notices

Notices

- [Notice of Staff Workshop to BellSouth Telecommunications, Inc. & All Other Interested Persons \(PDF file size = 8K\)](#)
- [Notice of Staff Workshops on Interim Performance Metrics for OSS Testing \(PDF file size = 11K\)](#)
- [Notice of Conference Call Held November 10th with BST, FPSC Staff and Rythms to Clarify XDSL Preordering Testing MTP issues](#)

● [Conference Call Schedule](#)

**** All Conference Calls can be accessed at (205) 970-3744/ Access Code 6261 at 10am on the date scheduled****



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BEFORE THE
ARIZONA CORPORATION COMMISSION

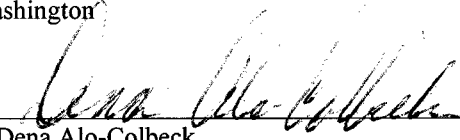
IN RE: US WEST COMMUNICATIONS)
INC'S COMPLIANCE WITH SECTION)
271 OF THE TELECOMMUNICATION ACT)
OF 1996)
_____)

Docket No: U-0000-97-238
T00000A-97-0238

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Comments of the Telecommunications Resellers Association on all parties of record in this proceeding, via United States Mail, as noted on the following service list.

Dated this 7th Day of January, 2000 at Gig Harbor, Washington


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